

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
NEWNAN DIVISION**

GLORIA KERR,

:

Plaintiff

:

CIVIL ACTION FILE

vs.

:

NO.: 3:15-cv-28-TCB

CHELSEA KERR RICHMOND

:

:

Defendant

**PLAINTIFF'S RESPONSE TO
MOTION TO AMEND THE ORDER ON JAMES CLIFTON'S
AMENDED MOTION FOR EXPENSES OF RECEIVER**

COMES NOW Plaintiff, and for her Response to Motion to Amend the Order on James Clifton's Amended Motion for Expenses of Receiver and respectfully requests the Court to DENY James Clifton's Motion to Amend the Order on James Clifton's Amended Motion for Expenses of Receiver. In support of this instant Response, Plaintiff relies upon the evidence of record and her Brief in Support of Plaintiff's Response to Motion to Amend Order on James Clifton's Amended Motion for Expenses of Receiver.

WHEREFORE, Plaintiff respectfully prays that this Court DENY the Motion to Amend Order on James Clifton's Amended Motion for Expenses of Receiver.

This 6th day of December, 2016.

Respectfully submitted,

/s/Jason G. Smith

Jason G. Smith
GA Bar No. 237877
ATTORNEY FOR PLAINTIFF

SOUTHERN PIEDMONT LAW, PC
22 West Court Square,
Suite C-4
Newnan, GA 30263
Phone: (678) 423-3177
Fax: (678) 359-3562
southernpiedmontlaw@gmail.com

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
NEWNAN DIVISION**

GLORIA KERR,

:

Plaintiff

:

CIVIL ACTION FILE

vs.

:

NO.: 3:15-cv-28-TCB

CHELSEA KERR RICHMOND

:

:

Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the date below, I electronically filed Plaintiff's Response to Motion to Amend Order on James Clifton's Amended Motion for Expenses of Receiver with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following, and Plaintiff transmitted said document via email and U.S. Postal Service to the following:

James Clifton, Esq.

james.clifton@cliftonlawfirm.com

Chelsea Richmond

Chelsea.K.Richmond@gmail.com

123 Daisey Ln

Justin, TX 76247

This 6th day of December, 2016.

Respectfully submitted,

/s/ Jason G. Smith

Jason G. Smith
GA Bar No. 237877
ATTORNEY FOR PLAINTIFF
22 West Court Square, Suite C-4
Newnan, GA 30263
Phone: (678) 423-3177
Fax: (678) 359-3562
southernpiedmontlaw@gmail.com